



Lawrence S. Lustberg

Gibbons P.C.  
One Gateway Center  
Newark, NJ 07102-5310  
Direct: 973-596-4731 Fax: +1 973-639-6285  
llustberg@gibbonslaw.com

April 11, 2024

**VIA ECF**

The Honorable Sidney H. Stein  
U.S. District Judge, Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: United States v. Robert Menendez, et al., Case No. 1:23-cr-00490-SHS**

Dear Judge Stein:

As the Court is aware, this Firm represents Defendant Wael Hana in the above captioned matter. As the Court directed, all defense counsel and the government conferred following today's pretrial conference and are in agreement that a modest modification to the Court's pre-trial schedule would be beneficial to facilitate further collaboration with regard to jury instructions. Specifically, we request that the deadline to submit requests to charge, currently April 12, 2024, be adjourned to Wednesday, April 17, 2024.

We thank the Court for its consideration of this request. Please do not hesitate to contact me if I can be of any assistance.

Respectfully submitted,

s/Lawrence S. Lustberg  
Lawrence S. Lustberg, Esq.

cc: All counsel of record (*via ECF*)